

EXHIBIT 19

From: Singh, Rani (SHF) <rani.singh@sfgov.org>
Sent: Friday, May 17, 2024 9:45 PM
To: Kim, Sujung (PDR); Martin, Tiffany (SHF); Liebchen Bosley; Michael Begert; Fleischaker, Eric (PDR)
Cc: Dawson, Michele (DAT); SHF-Community-Programs-Sworn; Judson, Philip (SHF); Lavitoria, Adrian (SHF); Razzaq, Hadi (PDR); Kelleher, William (SHF)
Subject: Re: Jackson Wade Vandeusen CT # 23016773, 23012573, 24003016, 24003014,

Su Jung et Al-

Neither you nor I are the attorneys of record for the federal case, so I don't feel it is appropriate to litigate the matter on this email.

As to this particular case :

The court's order does not provide for the 10-35 we need to Safely administer EM within our program guidelines. If we respond to the court after an order is made that we cannot safely administer EM for this client without an SFSO 10-35 at a minimum, we are not at all forcing the court to keep this gentlemen in custody. In fact to the contrary, we are alerting the court immediately that we cannot accept the client into our particular program with the order we received. The court then has options. It's up to the court to adjust its order or revisit other options. The court then has the ability to order release under an OR or ACM without EM if that's what they wish and we would process that release ASAP.

However, the court did not order OR or just ACM in this case. They ordered EM through our SFSO program. And we have indicated that to be able to administer the program safely and effectively within our guidelines we necessitate at a minimum a 10-35 "SFSO only" search.

Again thank you for your perspective on what you think was successfully or "unsuccessfully" litigated. We have and will continue to adhere to the PI on data sharing prohibitions as well as express 10-35 admonitions, so quite frankly I am at a loss as to your comment that SFSO is "ignoring" the PI. Again, I am happy to zoom in or appear by phone, but I am volunteer teaching at USF Law all day Monday so please reach out if you need me on this matter.

Best,
Rani Singh

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From: Kim, Sujung (PDR) <sujung.kim@sfgov.org>
Sent: Friday, May 17, 2024 5:25 PM
To: Singh, Rani (SHF) <rani.singh@sfgov.org>; Martin, Tiffany (SHF) <tiffany.martin@sfgov.org>; Liebchen Bosley <LBosley@sftc.org>; Michael Begert <MBegert@sftc.org>; Fleischaker, Eric (PDR) <eric.fleischaker@sfgov.org>
Cc: Dawson, Michele (DAT) <michele.dawson@sfgov.org>; SHF-Community-Programs-Sworn <SHF-CommunityProgramsSworn@sfgov.org>; Judson, Philip (SHF) <philip.judson@sfgov.org>; Lavitoria, Adrian (SHF) <adrian.lavitoria@sfgov.org>; Razzaq, Hadi (PDR) <hadi.razzaq@sfgov.org>; Kelleher, William (SHF) <william.kelleher@sfgov.org>
Subject: RE: Jackson Wade Vandeusen CT # 23016773, 23012573, 24003016, 24003014,

All of these points were argued unconvincingly in the federal litigation. The district court has ruled and the Sheriff is deliberately choosing to ignore the preliminary injunction. See you Monday.

Best regards,

Sujung Kim (she/her)
Managing Attorney | Research Unit

San Francisco Public Defender's Office
555 7th Street | San Francisco, CA 94103
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From: Singh, Rani (SHF)

Sent: Friday, May 17, 2024 4:42 PM

To: Martin, Tiffany (SHF) <tiffany.martin@sfgov.org>; Kim, Sujung (PDR) <sujung.kim@sfgov.org>; Liebchen Bosley <LBosley@sftc.org>; Michael Begert <MBegert@sftc.org>; Fleischaker, Eric (PDR) <eric.fleischaker@sfgov.org>

Cc: Dawson, Michele (DAT) <michele.dawson@sfgov.org>; SHF-Community-Programs-Sworn <SHF-CommunityProgramsSworn@sfgov.org>; Judson, Philip (SHF) <philip.judson@sfgov.org>; Lavitoria, Adrian (SHF) <adrian.lavitoria@sfgov.org>; Razzaq, Hadi (PDR) <hadi.razzaq@sfgov.org>; Kelleher, William (SHF) <william.kelleher@sfgov.org>

Subject: Re: Jackson Wade Vandeusen CT # 23016773, 23012573, 24003016, 24003014,

Judge et Al:

There are many options in this case, but an order to EM without at least imposing a 10-35 SFSO search is not something we can accept into our CP. We are informing the court immediately of our inability to supervise without some version of the search necessary to safely administer this program. The court can change its order to OR for the defendant if they do not feel he needs the supervision required under our EM program guidelines. The court can also order ACM in the alternative without EM. The court can also order EM with 10-35 SFSO only which limits other law enforcement from Engaging in a search. But as SFSO has made it clear we are not able to effectively supervise someone on EM without the ability to do compliance checks etc which may necessitate basic 10-35 allowances. Further, based on the federal case we have made sure we are adhering to all aspects of the PI pending the outcome of the appeal. This is the very reason we are immediately notifying the court so that the client's rights are in fact protected, so I am happy to clarify our position On Monday, however I am presenting at USF law school, so I would ask if there is a zoom link or a call in Number I will be happy to Join in any conversation.

Best,

Rani Singh

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From: Martin, Tiffany (SHF) <tiffany.martin@sfgov.org>

Sent: Friday, May 17, 2024 3:02 PM

To: Kim, Sujung (PDR) <sujung.kim@sfgov.org>; Liebchen Bosley <LBosley@sftc.org>; Michael Begert <MBegert@sftc.org>; Fleischaker, Eric (PDR) <eric.fleischaker@sfgov.org>

Cc: Dawson, Michele (DAT) <michele.dawson@sfgov.org>; SHF-Community-Programs-Sworn <SHF-CommunityProgramsSworn@sfgov.org>; Judson, Philip (SHF) <philip.judson@sfgov.org>; Lavitoria, Adrian (SHF) <adrian.lavitoria@sfgov.org>; Razzaq, Hadi (PDR) <hadi.razzaq@sfgov.org>; Singh, Rani (SHF) <rani.singh@sfgov.org>; Kelleher, William (SHF) <william.kelleher@sfgov.org>

Subject: Re: Jackson Wade Vandeusen CT # 23016773, 23012573, 24003016, 24003014,

Good Afternoon

As a reminder, the court has other options of supervision, which do not include EM administered by the SF Sheriff's Office.

Respectfully,

Sergeant Tiffany Martin #2123
Community Programs
70 Oak grove St. San Francisco, CA 94107
Phone: (415) 575-6461
Work Cell: (415) 852-1197
E-Mail: Tiffany.Martin@sfgov.org

From: Kim, Sujung (PDR) <sujung.kim@sfgov.org>
Sent: Friday, May 17, 2024 2:57 PM
To: Liebchen Bosley <Lbosley@sftc.org>; Michael Begert <MBegert@sftc.org>; Fleischaker, Eric (PDR) <eric.fleischaker@sfgov.org>
Cc: Dawson, Michele (DAT) <michele.dawson@sfgov.org>; SHF-Community-Programs-Sworn <SHF-CommunityProgramsSworn@sfgov.org>; Judson, Philip (SHF) <philip.judson@sfgov.org>; Lavitoria, Adrian (SHF) <adrian.lavitoria@sfgov.org>; Razzaq, Hadi (PDR) <hadi.razzaq@sfgov.org>
Subject: RE: Jackson Wade Vandeusen CT # 23016773, 23012573, 24003016, 24003014,

It appears that the Sheriff refuses to release Mr. Vandeusen on EM, despite this court's order, because the court found that a search condition is not a necessary condition of release.

The Sheriff is in clear violation of, not only this court's EM release order, but also the federal district court preliminary injunction (attached), which at page 41 clearly enjoins the Sheriff from "imposing or enforcing a search condition broader than that ordered by the Superior Court..."

Although Sheriff has appealed the preliminary injunction to the Ninth Circuit, the Sheriff's request to stay the injunction pending appeal was denied, so it is currently in full force and effect.

I request that the court add Mr. Vandeusen's case to calendar on Monday morning to address the Sheriff's refusal to follow this court's EM release order. Mr. Vandeusen is being held in custody illegally.

Best regards,

Sujung Kim (she/her)
Managing Attorney | Research Unit
San Francisco Public Defender's Office
555 7th Street | San Francisco, CA 94103
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From: Liebchen Bosley [<mailto:Lbosley@sftc.org>]
Sent: Friday, May 17, 2024 1:57 PM
To: Michael Begert <MBegert@sftc.org>
Cc: Kim, Sujung (PDR) <sujung.kim@sfgov.org>; Dawson, Michele (DAT) <michele.dawson@sfgov.org>
Subject: Fwd: Jackson Wade Vandeusen CT # 23016773, 23012573, 24003016, 24003014,

Please read the email below regarding search conditions not being imposed as ordered by the court and let me know how to proceed.

Thank you,
Liebchen Bosley
Courtroom Clerk

From: Cheryl Sebastian <CSebastian@sftc.org>
Sent: Friday, May 17, 2024 1:53:20 PM
To: Martin, Tiffany (SHF) <tiffany.martin@sfgov.org>; Liebchen Bosley <Lbosley@sftc.org>
Subject: Re: Jackson Wade Vandeusen CT # 23016773, 23012573, 24003016, 24003014,

I don't think this email was meant for me. CC'ing the correct clerk.

Thanks,
Cheryl

From: Martin, Tiffany (SHF) <tiffany.martin@sfgov.org>
Sent: Friday, May 17, 2024 1:42:06 PM
To: Cheryl Sebastian <CSebastian@sftc.org>
Subject: Fw: Jackson Wade Vandeusen CT # 23016773, 23012573, 24003016, 24003014,

⚠ WARNING: This email was generated from an external source. You should only open files from a trustworthy source.

I forwarded this to you now since I didn't have your e-mail address.

Sergeant Tiffany Martin #2123
Community Programs
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From: Martin, Tiffany (SHF) <tiffany.martin@sfgov.org>
Sent: Friday, May 17, 2024 12:46 PM
To: Michael Begert <MBegert@sftc.org>; Dawson, Michele (DAT) <michele.dawson@sfgov.org>; Fleischaker, Eric (PDR) <eric.fleischaker@sfgov.org>; Lbosley@sftc.com <Lbosley@sftc.com>
Cc: SHF-Community-Programs-Sworn <SHF-CommunityProgramsSworn@sfgov.org>; Judson, Philip (SHF) <philip.judson@sfgov.org>; Lavitoria, Adrian (SHF) <adrian.lavitoria@sfgov.org>
Subject: Jackson Wade Vandeusen CT # 23016773, 23012573, 24003016, 24003014,

Good Morning

Today The San Francisco Sheriff's Department Electronic Monitoring Unit received a PTEM Court Order /Minutes for Defendant Jackson Wade Vandeusen CT # 23016773, 23012573, 24003016, 24003014. The minutes state that "Search Conditions are not Imposed. " The PTEM form is correct but we will need the minute order corrected allowing a warrantless search condition by at least the SF Sheriff's Office covering the person, vehicle, property, and home of the defendant, for him to participate in the SFSO PTEM program. This will avoid violating the defendants Fourth Amendment rights while on supervised release.

Respectfully,

Sergeant Tiffany Martin #2123
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